

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TRUSTEES OF THE SUBURBAN TEAMSTERS)
OF NORTHERN ILLINOIS PENSION FUND)
AND WELFARE FUNDS,)
Plaintiff,)
v.) No. 07 C 7246
) Judge Bucklo
JEANNE BARNES TRUCKING, INC.)
an Illinois corporation and)
JEANNE BARNES, Individually) Magistrate Judge Keys
Defendants.)

MOTION FOR JUDGMENT IN SUM CERTAIN

NOW COMES the Plaintiff, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUND, by and through its attorney, JOHN J. TOOMEY, ARNOLD AND KADJAN, and pursuant to FRCP 55 move for entry of a default judgment in sum certain as stated in this Complaint and the supporting Affidavits attached hereto. In support of its Motion, Plaintiffs state as follows:

1. Suit was filed on December 27, 2007 for collection of delinquent contributions, attorneys' fees, costs and interest under 29 U.S.C. 1132(g)(2).
2. Corporate service was made upon JEANNE BARNES TRUCKING, INC., an Illinois corporation, on January 4, 2008 and a copy of the proof of service was filed with the court on January 9, 2008.
3. Service was made upon JEANNE BARNES, Individually on January 4, 2008 and a copy of the proof of service was filed with the court on January 9, 2008.

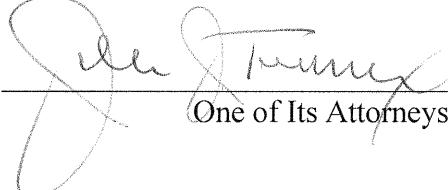
4. Defendants are now in default as to the Complaint and as supported by the attached Affidavits the sums due are:

\$6,319.98 Pension
\$10,924.93 Welfare
\$2,830.41 Pension Installment Note
\$5,101.30 Welfare Installment Note
\$925.00 Attorneys fees
\$433.00 Court costs
\$26,534.62

WHEREFORE, Plaintiff prays for the entry of judgment against Defendants, jointly and severally, JEANNE BARNES TRUCKING,. INC. and JEANNE BARNES, Individually and in favor of Plaintiffs, TRUSTEES OF THE SUBURBAN TEAMSTERS OF NORTHERN ILLINOIS WELFARE AND PENSION FUNDS in the amount of \$26,534.62.

TRUSTEES OF THE SUBURBAN TEAMSTERS
OF NORTHERN ILLINOIS WELFARE AND
PENSION FUNDS

By:



One of Its Attorneys

JOHN J. TOOMEY
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